Appendix C: SNAP Retailer Applications
Burden Narrative

There are currently six application forms currently approved under OMB No. 0584-0008. For this submission to OMB, FNS is seeking approval for the information collection associated with forms FNS-252, FNS-252-C, FNS-E, FNS-252-FE, FNS-252-R, and FNS-252-2.

For SNAP retailer, farmers' market, and meal service applicants and military commissary authorization applicants, FNS estimated the number of responses in FY 2024 through 2026 based on FY 2022 data, the most recent complete data that were available. FNS inflated FY 2022 responses by 2 percent annually to project an annual average number of responses for FY 2024-FY 2026. However, for meal services, FNS estimated a more conservative increase of 1 percent responses per year.

For military commissary reauthorization applicants, FNS projected the number of responses in FY 2024, FY 2025 and FY 2026 based on the military commissaries that will be due for reauthorization each year.

1. **Form FNS-252:**

For the burden associated with form FNS-252, FNS estimates there will be 1,438.1 responses on average annually in FY 2024-2026, representing an increase from 1,355 in FY 2022. We estimate that it takes respondents, on average, 90 minutes (or 1.50) to complete form FNS-252. Total burden hours are 2,157.2 (1,438.1 x 1.5).

2. **Form FNS-252-E:**

For the burden associated with form FNS-252-E, FNS estimates there will be 29,153 responses on average annually in FY 2024-2026, representing an increase from 27,478

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in FY 2022. We estimate that it takes respondents, on average, 1 hour to complete form

FNS-252-E. Total burden hours are 29,153 (29,153 x 1).

3. **Form FNS-252-FE:**

For the burden associated with form FNS-252-FE, which is used by farmers' markets,

FNS estimates there will be 695 responses on average annually in FY 2024-2026,

representing an increase from 655 in FY 2022. We estimate that it takes respondents,

on average, 1 hour to complete form FNS-252-FE. Total burden hours are 695 (695

responses x 1 hour).

4. **eAuthentication:**

Applicants using form FNS-252-E or FNS-252-FE must also first self-register for a Level

1 access account through the USDA eAuthentication system to initially start an online

application. USDA eAuthentication facilitates the electronic authentication of an

individual and it takes approximately 8 minutes (or 0.133333 hours) to obtain an

eAuthentication account. The 60-day notice inaccurately included applicants submitting

the FNS-252-R electronically in the count of respondents required to register through the

USDA eAuthentication system, leading to an overestimate of the total burden. Applicants

submitting the FNS-252-R electronically are not included our projection of respondents

required to register through the USDA eAuthentication system in the Supporting

Statement – Part A, item A12A. We estimate an average of 29,847 retailers and farmers'

market (29,152 FNS-252-E applicants + 695 FNS-252-FE applicants) will register for

Level 1 access. The total burden hours for eAuthentication are calculated to be 3,979.6

(29,847 responses x 0.133333 hours).

5. **Form FNS-252-2:**

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For the burden associated with form FNS-252-2, FNS estimates there will be 873

responses on average annually in FY 2024-2026, representing an increase from 847 in

FY 2022. We estimate that it takes respondents, on average, 1 hour to complete form

FNS-252-2. Previous submissions used an estimate of 15 minutes, and FNS believes 1

hour is more accurate. Total burden hours are 873 (873 submissions x 1hour).

6. **Form FNS-252-C:**

For the burden associated with form FNS-252-C, which is used by multiple store

owners, FNS estimates there will be 5,945 responses on average annually in FY 2024-

2026, representing an increase from 5,601 in FY 2022. FNS provides a tabular data

entry format for 252-C users providing information for multiple locations. In this

submission, FNS counts each location, represented as a row in the application table, as

a response. We estimate that it takes respondents, on average, 15 minutes, or 0.25

hours, per response. Total burden hours are 1,486.3 (5,9445 responses x 0.25 hours).

7. **Store Visit estimates:**

During authorization or reauthorization, FNS may conduct an on-site store visit of the

firm. An FNS representative or store visit contractor obtains permission to complete the

store visit checklist, photograph the store and asks the store owner or manager about the

continued ownership of the store.

Previous submissions estimated that the retailer spent one minute interacting with the

FNS representative or contractor during the store visit. Under this proposed revision,

FNS is increasing the estimate to 10 minutes (0.1667 hours), which we believe is a more

accurate estimate of the time the retailer must spend with the FNS representative or

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contractor.

FNS estimates there will be 39,330 store visits on average annually in FY 2024-2026, representing an increase from 37,057 in FY 2022. Total burden hours are 6,555.0 (39,330 visits x 0.1667 hours).

8. **Form FNS-252-R:**

For reauthorization purposes, respondents use either FNS-252-R (paper) or the electronic version of this form, also known as FNS-252-R-ORA (online). FNS-252-R-ORA is generated in the Store Tracking and Redemption System (STARS) database and prepopulated with some information. We estimate that both FNS-252-R and FNS-252-R-ORA take 15 minutes (0.25 hours) to complete.

Reauthorization applicants submitted 5,526 paper FNS-252-R forms and 11,003 online FNS-252-R-ORA forms in FY 2022, for a total of 16,529 applications. With projected 2 percent growth each year, FNS estimates there will be 17,543 reauthorization responses on average annually in FY 2024-2026, and that estimated annual burden hours will total 4,385.8 (17,543 responses x 0.25 hours).

Recordkeeping Burden:

There are no recordkeeping burden requirements associated with this information collection.